



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278-0012

August 18, 1993

**EXPRESS MAIL-  
RETURN RECEIPT REQUESTED**

John K. Dema, Esq.  
Law Offices of John K. Dema, P.C.  
1236 Strand Street  
Suite 103  
Christiansted, St. Croix, USVI 00820-5008

Re: Request for CDM and Roy Weston Sampling Results at Tutu Wellfield Site

Dear Mr. Dema:

In response to your request of August 4, 1993, enclosed are the analytical results of samples taken by Camp Dresser & McKee and Roy Weston Inc. for the United States Environmental Protection Agency ("EPA") with respect to the above-referenced Site. The enclosed copies, as enumerated in the attached list, have been authenticated as true and correct copies of the originals of such analytical results which are contained in EPA files. I have affixed the EPA seal below as evidence of such authentication.

Sincerely yours

  
Douglas R. Blazey  
Regional Counsel

Attachments and Enclosures

cc: Sally Odland-CDM-FPC  
Carl Kelly--Roy Weston  
Andrew Praschak, Esq.

**DOCUMENTS FROM ROY WESTON:**

- 1) Memo dated 2/12/88 from Anibal Diaz to Paula Cammarata.
- 2) Memo dated 1/27/88 from Arnolando Martinez to Carlos O'Neill
- 3) Memo dated 8/3/87 from Anibal Diaz to Paula Cammarata.
- 4) Transmittal Memo dated 7/31/87 from Theresa Perrette to Paula Cammarata.
- 5) Chain of Custody Record for July 22, 1987
- 6) Well Sampling Results dated 9/9/87.
- 7) Analysis of Water Samples for Volatile Organic Compounds prepared by C.A.L. Technologies, Inc. for Roy Weston Inc. dated 7/30/87.
- 8) Table 1: Summary of Positive Analytical Results for Volatile Organic Compounds Found in Water Samples.
- 9) Results as of 8/18/87 Report
- 10) Preliminary Verbal Results received by T. Perette dated 8/19/87.
- 11) TOC's Tutu Wells Site dated 8/4/87
- 12) Table 1: List of Wells from DPNR
- 13) Completed Data Package from York Laboratories 20870-530
- 14) Split Samples Receipts: Lab #s: OW-011-A, OW-011, OW-006-A.
- 15) Chain-of-Custody Record : Project name: Texaco Caribbean, Inc.
- 16) Page 37 to 41: Section On 5.2.4- Waste Oil Sampling and Analysis- 17 August 1987.
- 17) Map on Tutu Texaco Station

**DOCUMENTS FROM CDM-FPC**

- 1) Letter dated 3/6/89 from Scott Graber to Caroline Kwan on CLP Sample Analysis Data Summary: Case No. 3900 I Ser 25.
- 2) Letter dated 3/31/89 from Scott Graber to Caroline Kwan on CLP Sample Analysis Data Summary of the Tutu Texaco Service Station Tanks Excavation.
- 3) Letter dated 3/31/89 from Scott Graber to Caroline Kwan on CLP Sample Analysis of the 104(e) Response Sampling.
- 4) Letter dated 4/14/89 from Scott Graber to Caroline Kwan on CLP Sample Analysis Data Summary of the 104(e) Letter Response Sampling.
- 5) Letter dated 5/31/90 from Scott Graber to Cathy Moyik on the Final CLP Sample Analysis Data Summary of Soils and Waters Samples in 1989.
- 6) Letter dated 6/8/93 from Scott Graber to Erwin Smieszek on Data Comparison and Evaluation Report.

AUG-17-1993 15:03 FROM EPA

TO

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FROM: EPA WDC-PAIS/PAK  
DATE: 8/17/93 BY: JKD/VI

TO: 1 812 804 4368 1503.08-04 08:41PM 8570 P.02/01  
JUN 18, 1993 F.C.

08:41PM 8570 P.02/01  
JUN 18, 1993 F.C.

LAW OFFICES OF JOHN K. DEMA, PC

4 August 1993

Via Facsimile Machine

Paul Simon, Esquire  
EPA Counsel  
Fax No. (212) 864-4368

Bob Field, Esquire  
ODM-FPC Counsel  
Fax No. (708) 908-0815

Brad Rossmann, Esquire  
U.S. Department of Justice  
Fax No. (202) 516-6426

Lee Wheeler, Esquire  
Roy F. Weston, Inc. Counsel  
Fax No. (215) 884-4678

RE: Tutu Water Wells Contamination Litigation

Dear Colleagues:

Four Winds Plaza Partnership hereby notifies everyone whose interest may be affected that the deposition of ODM-FPC scheduled for Monday, 9:00 a.m., in New York City, and the deposition of Roy F. Weston, Inc. for Tuesday, 2:00 p.m., in Edison, New Jersey have been postponed *sine die*.

In a spirit of cooperation, we are laboring with the assistance of the EPA to have the sampling results of these entities produced under self-authenticating seal and identifying the locations from which the samples were taken with specificity.

Since it was never the intention of Four Winds to attempt to solicit opinion testimony from the EPA contractors, this would meet any evidentiary requirements for these sampling results and Four Winds would, of course, publish and share these authenticated results with all other party litigants and make the sealed and authenticated exhibits available to all as master exhibits in the federal litigation.

Very truly yours,

John K. Dema, Esquire

JKD/VI

cc: All Tutu litigation counsel of record

Hi, George!

OPTIONAL FORM 36 (7-80)

FAX TRANSMITTAL

To: <u>J. K. Dema</u>	From: <u>AP</u>
Date: <u>8/17/93</u>	Phone: <u></u>
Fax: <u></u>	Fax: <u></u>

NSN 7540-01-217 7000 5/89 101

U.S. DEPARTMENT OF JUSTICE

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